U.S. ENVIRONMENTAL PROTECTION AGENCY VC. WCS 7/5/90



REGION X

IDAHO OPERATIONS OFFICE 422 WEST WASHINGTON STREET BOISE, IDAHO 83702

June 26, 1990

MEMORANDUM

N.P.D.E.S. Compliance Inspection - Cyprus SUBJECT:

Thompson Creek Mining Co. ID-002540-2

FROM:

Gordon Hopson

TO:

Don Gibbins

On May 29, 1990, an N.P.D.E.S. Compliance Inspection was conducted on the Cyprus Thompson Creek Mine ID-002540-2. Bert Doughty, Supervisor of Environmetal Affairs, accompanied me throughout the inspection.

The inspection and sampling began at 11:15 a.m.

Besides sampling for compliance from outfalls 001, 002, and 003, the pit dewatering was of prime importance.

Last year the water in the pit was being divided, half of the pumped flow was going to the tailings pond and half to the Pat Hughes Dump, this flow was reaching Pat Hughes Creek above the seattling ponds. Last year we strongly recommended that Cyprus discontinue the practice of pumping the pit water to the Pat Hughes Creek Dump. Shortly after receiving our letter, Cyprus increased the pipeline size from 4 to 8 inches going to the tailings pond and disconnected the pipeline that discharged to the Pat Hughes Creek Dump. Presently all pit water is discharged to the tailings pond.

The pit is presently making 200 GPM. The water in the pit is estimated to be 2 acres in size, 25' deep, and 26,000,000 gallons in total volume.

Mr. Doughty told me that they had only recently started to pump the pit water and that he thought pumping would be continuous from now on.

The pH of the pit water in November was 7.0 - 7.1, however, about May 1 the pH dropped to 3.3 and has remained there. Apparently, the buffering action of the rock had run out.

Cyprus plans to increase the depth of the pit by 800 to 900 feet. Present plans for dewatering call for all pit water to be discharged into the tailing pond. How much more water they will make per minute while going deeper is anyone's guess, however, it will increase and this could be a problem. I asked Bert to keep us informed.

Turbidity above and below 003 discharge was done in the field. Both samples read out at 2.2 N.T. \dot{N} . \dot{N} .

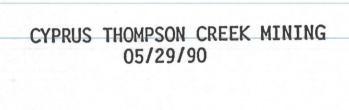
Samples for heavy metal and suspended solid analysis were collected from 001 and 002 discharges and taken to the Idhao State Laboratory in Boise to be analyzed.

Mr. Doughty had several questions which were:

- 1. Why are spiked samples so much higher than permit requirements? He also would like to have all metals included in the spiked sample, not just one or two.
- 2. Would a storm water runoff permit be needed if storm water never reached the creek?

Inspection was completed at 15:45 p.m.

2321B



United States Environmental Protection Agency

Form Approved

SEPA	N N F		oliance Inspe	ection Rep	oort	OMB No. 2040-0003 Approval Expires 7-31-85
Section A: National Data System Coding						
Transaction Coo		NPDES 2540211	12 90 05 2 5			pector Fac Type
; 1111			Remarks			66
Reserved 67 6	Facility Evaluatio	-	71 72 OA	73 74	Reserved	80
			Section B: Facility Da	ita		
Name and Loca	ition of Facility II	nspected		Entry Tim	AM P	M Permit Effective Date
P.O. Bos	5 602 60 = da	iho 8322	7	Exit Time		Pormit Expiration Date 8/2/93
Name(s) of On-S	ite Representative		Title(s)	-	de la companya de la	Phone No(s)
Bert	- Doug	hty		sop Envir	ion menta	208-838-2200
- Name, Address o	f Responsible Offic	cial /	Genera	1 Mana	gen	
Pat 4	itch		Phone No.		~	Contacted Yes No
			n C: Areas Evaluated D M = Marginal, U = Unsa		Evaluated)	
15' Permit		5 Flow Measure	-	Pretreatment		77
5 Records/R		N Laboratory	eiving Waters 3	Compliance Sche		Sludge Disposal
5 Facility Sit		5 Effluent/Reco	Findings/Comments //	Self-Monitoring		Other:
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Name(s) and Signature(s) of Inspector(s) Agency/Office/Telephone Date Signature of Reviewer Agency/Office Date Regulatory Office Use Only Regulatory Office Use Only Action Taken Date Compliance Status Noncompliance Compliance

Records, Reports, and Schedules Ch. st

A. Permit Verification

YES NO N/A	INSPECTION OBSERVATIONS VERIFY INFORMATION CONTAINED IN PERMIT
Yes No N/A	1. Correct name and mailing address of permittee.
Yes No N/A	2. Facility is as described in permit.
Yes No N/A	3. Notification has been given to EPA/State of new, different, increased discharges.
Yes No N/A	4. Accurate records of influent volume are maintained, when appropriate.
Yes No N/A	5. Number and location of discharge points are as described in the permit.
Yes No N/A	6. Name and location of receiving waters are correct.
Yes vo w/A	7. All discharges are permitted.
-	

B. Recordicepting and Reporting Evaluation

	to recovered my selecting management
YES NO N/A	RECORDS AND REPORTS ARE MAINTAINED AS REQUIRED BY PERMIT
Yes No N/A	 All required information is available, complete, and current; and Information is maintained for required period. Analytical results are consistent with the data reported on the DMR's.
Yes No N/A	
Yes No N/A Yes No N/A	5. Monitoring records are adequate and include a. Flow, pH, D.O., etc. as required by permit b. Monitoring charts
Xes No N/A	6. Laboratory equipment calibration and maintenance records are adequate.
Yes No N/A	7. Plant Records are adequate* and include a. O&M Manual b. "As-built" engineering drawings c. Schedules and dates of equipment maintenance and repairs d. Equipment supplies manual e. Equipment data cards *Required only for facilities built with Federal construction grant funds.

Records, Reports, and Schedules Ched

	. Pretreatment records are adequate and include: a. Industrial Waste Ordinance (or equivalent documents)
Yes No N/A Yes No N/A Yes No N/A Yes No N/A	 b. Inventory of industrial waste contributors, including: 1. Compliance records
Yes No N/A	2. User charge information

Yes No N/A 9. SPCC properly completed,	when required.	

Yes No N/A 10. Best Management Practices Program available, when required.

C. Compliance Schedule Status Review

YES NO N/A	THE PERMITTEE IS MEETING THE COMPLIANCE SCHEDULE	
Yes No N/A	1. The permittee has obtained necessary approvals to begin construction.	
Yes No N/A	2. Financing arrangements are complete.	
Yes No N/A	3. Contracts for engineering services have been executed.	
Yes No N/A	4. Design plans and specifications have been completed.	
Yes No N/A	5. Construction has begun.	
Yes No N/A	6. Construction is on schedule.	
Yès No N/A	7. Equipment acquisition is on schedule.	
Yes No N/A	8. Construction has been completed.	
Yes No N/A	9. Start up has begun.	
Yes No N/A	10. The permittee has requested an extension of time.	
Yes No N/A	11. The permittee has met compliance schedule.	

Records, Reports, and Schedules Checklist

D. POTW Pretreatment Requirements Review

	E FACILITY IS SUBJECT TO PREIREATMENT REQUIREMENTS		c
1:	Status of POTW Pretreatment Program	:	·
Yes No N/A	a. The POTW Pretreatment Program has been approved by EPA. in progress?	(If not,	is approval
Yes No N/A	b. The POTW is in compliance with the Pretreatment Program (If not, note why, what is due, and intent of the POTW t	Compliance o remedy)	Schedule.

		o N/A	Pretreatment Standards?
		N/A	applicable standards?
Ye	s No	N/A	c. Have baseline monitoring reports (403.12) been submitted for these industries?
Ye	s No	N/A	i. Have categorical industries in noncompliance (on EMR reports) submitted compliance schedules?
Yes	s No	N/A	ii. How many categorical industries on compliance schedules are meeting the schedule deadlines?
Yes	s No	N/A	d. If the compliance deadline has passed, have all industries submitted 90 day compliance reports?
Yes	No.	N/A	
Yes	s No	N/A	f. Are all new industrial discharges in compliance with new source pretreatment standards?
Yes	No.	N/A	g. Has the POTW submitted its annual pretreatment report?
Yes	No.	N/A	h. Has the POTW taken enforcement action against noncomplying industrial users?
Yes	No.	N/A	i. Is the POTW conducting inspections of industrial contributors?
			i .

		-
Yes No N/A	3. Are the industrial users subject to Prohibited Limits (403.5) and local limits	200
1-00 100 11/11	1 12 cite in the series subject to from often things (405.5) and local times	3
1	more stringent than EPA in compliance?	
1 1		
1 1	(If not, explain why, including need for revision of limits.)	
1 1	The state of the s	

· Facility Site Review Checklin

1. Standby power or other equivalent provision is provided.
2. Adequate alarm system for power or equipment failures is available.
3. POTW handles and disposes of sludge according to applicable Federal, State, and and local regulations.
4. All treatment units, other than back-up units, are in service.
5. Procedures for facility operation and maintenance exist.
6. Organization plan (chart) for operation and maintenance is provided.
7. Operating schedules are established.
8. Emergency plan for treatment control is established.
9. Operating management control documents are current and include: a. Operating report b. Work schedule c. Activity report (time cards)
10. Maintenance record system exists and includes: a. As-built drawings b. Shop drawings c. Construction specifications d. Maintenance history e. Maintenance costs
11. Adequate number of qualified operators are on-hand.
12. Established procedures are available for training new operators.
13. Adequate spare parts and supplies inventory and major equipment specifications are maintained.
14. Instruction files are kept for operation and maintenance of each item of major equipment.
15. Operation and maintenance manual is available.
16. Regulatory agency was notified of by passing. (Dates)

'Facility Site Review Checklist

Yes No N/A	17. Hydraulic and/or organic overloads are experienced. Reasons for overloads	
		-
Yes No N/A	18. Up-to-date equipment repair records are maintained.	
Yes No N/A	19. Dated tags show out of service equipment.	
Yes No N/A	20. Routine and preventive maintenance are scheduled/performed on time.	

Penulttee Sampling Inspection Checkens

A. Permittee Sampling Evaluation

	<u> </u>
Yes No N/A	1. Samples are taken at sites specified in permit.
Yes No N/A	2. Locations are adequate for representative samples.
Yes No N/A	3. Flow proportioned samples are obtained where required by permit.
Yes No N/A	4. Sampling and analysis completed on parameters specified by permit.
Yes No N/A	5. Sampling and analysis done in frequency specified by permit.
Yes No N/A	6. Permittee is using method of sample collection required by permit. Required Method: Correl If not, method being used is: (X) Grab () Manual composite () () Automatic composite
Mes No N/A Les No N/A Mes No N/A	7. Sample collection procedures are adequate: a. Samples refrigerated during compositing b. Proper preservation techniques used c. Containers and sample holding times before analyses conform with 40 CFR 136.3
Yes No N/A	8 Monitoring and analyses are performed more often than required by permit. If so, results reported in permittee's self-monitoring report.

B Sampling Inspection Procedures and Observations

Yes No N/A	1. Grab samples obtained.
Yes No N/A	2. Composite sample obtained Compositing frequency Preservation
Yes No (N/A)	3. Sample refrigerated during compositing.
Yes No N/A	4. Flow proportioned sample obtained.
Yes to N/A	5. Sample obtained from facility sampling device.
Yes No N/A	6. Sample representative of volume and nature of discharge.
Yes No N/A	7. Sample split with permittee.
Yes No N/A	8. Chain of custody procedures employed.

A. Flow Measurement Inspection Checklist - General

Yes No N/A				
Yes No N/A		Yes	No	N/A
Yes No N/A Yes No N/A Yes No N/A Yes No N/A		Yes	No	N/A
Yes No N/A Yes No N/A Yes No N/A	(Yes	No	N/A
Yes No N/A		(es)	No	N/A
Yes No N/A		Yes	No	N/A
		Yes	No	N/A
Yes No N/A		Yes	No	N/A
	-	Yes	No	N/A

- 1. Primary flow measuring device is properly installed and maintained.
- Flow records are properly kept.
- 3. Sharp drops or increases in flow values are accounted for.
- 4. Actual flow discharged is measured.
- 5. Influent flow is measured before all return lines.
- 6. Effluent flow is measured after all return lines.
- Secondary instruments (totalizers, recorders, etc.) are properly operated and maintained.
- 8. Spare parts are stocked.

B. Flow Measurement Inspection Checklist - Fluxes

Yes	No	N/A
Yes	No	N/A
Yes	No	N/A
Yes	, No	N/A
Yes	No	N/A
Yes	No	N/A
Yes	No	N/A
Yes	No	N/A
Yes	No	N/A
Yes	No	N/A

- Flow entering flume appears reasonably well distributed across the channel and free of turbulence, boils, or other distortions.
- 2. Cross-sectional velocities at entrance are relatively uniform .
- 3. Flume is clean and free of debris or deposits.
- 4. All dimensions of flume are accurate.
- 5. Side walls of flume are vertical and smooth.
- 6. Sides of flume throat are vertical and parallel.
- 7. Flume head is being measured at proper location.
- 8. Measurement of flume head is zeroed to flume crest.
- 9. Flume is of proper size to measure range of existing flow.
- 10. Flume is operating under free-flow conditions over existing range of flows.

				C. Flow Measurement Inspection Checklist - Wiers	
_					_
			1.	What type of weir is being used?	
Yes	No	N/A	2.	The weir is exactly level.	
Yes	No	N/A	3.	The weir plate is plumb and its top edges are sharp and clean.	
Yes	No	N/A	4.	There is free access for air below the nappe of the weir.	
Yes	No	N/A	5.	Upstream channel of weir is straight for at least four times the depth of water level, and free from disturbing influences.	
Yes	No	N/A	6.	The stilling basin of the weir is of sufficient size and clear of debris.	_
Yes	No	N/A	7.	Head measurements are properly made by facility personnel.	
ves	No	N/A	8.	Proper flow tables are used by facility personnel.	
). Flow Measurement Inspection Checklist — Other Flow Devices	_
			1.	Type of flowmeter used:	
			2.	What are the most common problems that the operator has had with the flowmeter?	
	à				
			3.	Measured Wastewater flow:mgd; Recorded flow:mgd; Error	Z
			4.	Design flow:mgd.	
Yes	No	N/A	5.	Flow totalizer is properly calibrated.	
			6.	Frequency of routine inspection by proper operator:/day.	
			7.	Frequency of maintenance inspections by plant personnel:/year.	
			8.	Frequency of flowmeter calibration:/month.	
Yes	No	N/A	9.	Flow measurement equipment adequate to handle expected ranges of flow rates.	_
Yes	No	N/A	10.	Venturi meter is properly installed and calibrated.	
Yes	Мо	N/A	11.	Electromagnetic flowmeter is properly calibrated.	

Laboratory Quality Assurance Checklist

A. General

Yes No N/A	1. Written laboratory quality assurance manual is available.
	B . Laboratory Procedures
Yes No N/A	1. EPA approved analytical testing procedures are used.
Yes No N/A	2. If alternate analytical procedures are used, proper approval has been obtained.
Yes No N/A	3. Calibration and maintenance of instruments and equipment is satisfactory.
Yes No N/A	4. Quality control procedures are used.
Yes No(N/A	5. Quality control procedures are adequate.
	6. Duplicate samples are analyzed% of time.

% of time.

8. Commercial laboratory is used Name ACZ labor tories Inc

Address 1475 Pine Corove Rd Suite 109 Contact Steam bout Springs, Colo. 9 0487

7. Spiked samples are used

Yes No N/A

C. Laboratory Facilities and Equipment

Phone

Yes No N/A	1. Proper grade distilled water is available for specific analysis.
Yes No N/A	2. Dry, uncontaminated compressed air is available.
Yes No N/A	3. Fume hood has enough ventilation capacity.
Yes No N/A	4. The laboratory has sufficient lighting.
Yes No N/A	5. Adequate electrical sources are available.
Yes No N/A	6. Instruments/equipment are in good condition.
Yes No N/A	7. Written requirements for daily operation of instruments are available.

C. Laboratory Facilities and Equipment (continued)

Yes No N/A	8. Standards are available to perform daily check procedure.
Yes No N/A	9. Written trouble-shooting procedures for instruments are available.
Yes No N/A	10. Schedule for required maintenance exists.
Yes No N/A	11. Proper volumetric glassware is used.
Yes No N/A	12. Glassware is properly cleaned.
Yes No N/A	13. Standard reagents and solvents are properly stored.
Yes No N/A	14. Working standards are frequently checked.
Yes No N/A	15. Standards are discarded after recommended shelf life has expired.
Yes No N/A	16. Background reagents and solvents run with every series of samples.
Yes No N/A	17. Written procedures exist for cleanup, hazard response methods, and applications of correction methods for reagents and solvents.
Yes No N/A	18. Gas cylinders are replaced at 100-200 psi.

D. Laboratory's Precision, Accuracy, and Control Procedures

Yes No N/A	1. A minimum of seven replicates is analyzed for each type of control check and this information is on record.
Yes No N/A	2. Plotted precision and accuracy control charts are used to determine whether valid, questionable, or invalid data are being generated from day to day.
Yes No N/A	3. Control samples are introduced into the train of actual samples to ensure that valid data are being generated.
Yes No N/A	4. The precision and accuracy of the analyses are good.

Laboratory Quality Assurance Checkli

intinued)

E. Data Handling and Reporting

-	
Yes No N/A	1. Round-off rules are uniformly applied.
Yes No N/A	2. Significant figures are established for each analysis
Yes No N/A	3. Provision for cross-checking calculation is used
Yes No N/A	4. Correct formulas are used to reduce to simplest factors for quick, correct calculation
Yes No N/A	5. Control chart approach and statistical calculations for quality assurance and report are available and followed
Yes No N/A	6. Report forms have been developed to provide complete data documentation and permanent records and to facilitate data processing
Yes No N/A	7. Data are reported in proper form and units
Yes No N/A	8. Laboratory records are kept readily available to regulatory agency for required period of time
Yes No N/A	9. Laboratory notebook or preprinted data forms are permanently bound to provide good documentation
Yes No N/A	10. Efficient filing system exists enabling prompt channeling of report copies

F. Laboratory Personnel

Yes No N/A	1. The analyst has appropriate training
Yes No N/A	2. The analyst follows the specified procedures
Yes No N/A	3. The analyst is skilled in performing analyses

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CYPRUS THOMPSON CREEK WATER QUALITY ANALYSIS SAMPLE DATA SHEETS

tation: OOL	Date Collected:	5/29/90	Time:	140	27
ir Temperature:	°C Weather:	1 /			
b. 4.6. Turbid	umhos/cm a	t 25°C Sample	e Temp	:	
erson Conducting Sa	ity: But Joygn a	auge:	_ Flo	W:	8,03 cf
ate Samples Mailed	to Lab:		Mimo		Signe
	300		Time:		
		1	·		
Analysis Group	Parameters to be tested	Preservative Added	Collected		
					Sample
			Yes	No	Size
Physical Properties	TES				
Cations & Anions	TSS Potassium Alkalinity Silica	None	1		
	Hardness Sodium		X		1 1/2 L
	Calcium Sulfate				12.
	Chloride Sulfide				
	Magnesium TDS		1		5)
Nutrients and	With a super my n				
Organics	Nitrogen-TKN Phosphate - Nitrate Carbon-TOC	G., 3. f., i			
	- Nitrite	Sulfuric		1	
	- Ammonia	Acid (H ₂ SO ₄)			
Other Nutrients	BOD COD	None			
Biological	Total Coliform Bacteria	Sodium			
	Fecal Coliform Bacteria	Thiosulfate			
m					
Trace Metals	Aluminum (Lead	Nitric Acid			
	Arsenic Manganese	(HNO ₃)	1 1		
	Barium Mercury Molybdenum				
	Chromium Nickel				
	Cobalt Selenium				1/4
	Copper Silver				
(Iron Zinc			•	
Other Organics	Cyanide	Codium			
	o jantac	Sodium Hydroxide			
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EDA	salit during		_ /	,	
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CYPRUS THOMPSON CREEK WATER QUALITY ANALYSIS SAMPLE DATA SHEETS

erson conducting sal	ity: 0.75 N	umhos/cm at TU Staff Ga	t 25°C Sample	e Tem	D:	
ate Samples Mailed	to Lab:	1		Time	:	Signe
Analysis Group	Parameters to be tes	be tested	Preservative	Collected		Sample
Physical Properties	maa		Added	Yes	No	Size
Cations & Anions	Alkalinity Hardness Calcium Chloride Magnesium	Potassium Silica Sodium Sulfate Sulfide TDS	None	X		YzL
Nutrients and Organics	Nitrogen-TKN - Nitrate - Nitrite - Ammonia	Phosphate Carbon-TOC	Sulfuric Acid (H ₂ SO ₄)	÷		·
Other Nutrients	BOD	COD	None			
Biological	Total Colifor Fecal Colifor	m Bacteria m Bacteria	Sodium Thiosulfate			
Trace Metals	Barium Cadmium Chromium Cobalt Copper	Lead Manganese Mercury Molybdenum Nickel Selenium Silver	Nitric Acid (HNO ₃)	X	•	Y2L
Other Organics	Cyanide		Sodium Hydroxide (NaOH)	•		-
emarks: EPA SI	plit for	complui	nce pane	lorin		